



ANIMAL  
PROTECTION  
INSTITUTE

Mailing Address:  
PO. Box 22505  
Sacramento, CA 95822

Street Address:  
2831 Fruitridge Road  
Sacramento, CA 95820

Ph. 916.731.5521  
1.800.348.7387  
Fx. 916.731.4467  
onlineapi@aol.com  
www.api-4animals.org

August 20, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

1021 '99 AUG 25 P1:44

Docket Nos.: 98N-1230, 96P-0148, 97P-0197

The Animal Protection Institute, a non-profit animal advocacy organization with over 80,000 members, would like to submit the following comments on the above-referenced dockets concerning regulation of forced molting in egg-laying chickens.

The FDA has a mandate to protect the health of the American public through regulating food producers. To that end, I believe it requires more action than simply applying warning labels on egg containers, or regulating temperature so the bacterial count doesn't get much worse. If the FDA *knows* that there is a contamination problem with a product, it should assume the responsibility for correcting or at least abating the problem *at its source*. To attempt to transfer its basic food safety responsibility to the consumer is shameful.

The FDA is the federal agency with the jurisdiction and the duty to abolish farming practices which compromise the safety of the food supply and have the potential to cause injury to the consumer. Forced molting is a deliberate stress on the hens. Stress is proven to suppress the immune system. The practice of forced molting has been scientifically shown to promote the growth and shedding of *Salmonella* and cause disease in the chickens subjected to this practice due to stress-induced immune system suppression. Increased shedding of *Salmonella* directly causes disease in human consumers of eggs and egg products.

Forced molting is done in this country solely to increase profits for the growers. That it is a cruel and barbaric practice resulting in suffering, illness, and death in the chickens is unquestionable. But the question that we must ask ourselves in this debate is: how much profit is a child's life worth? How many profit dollars are adequate to compensate for illness, injury, and death in American consumers?

The FDA was petitioned in April, 1998, to ban forced molting. Please grant this petition immediately, without further delay. Our lives and health depend upon it.

Sincerely,

Jean Hofve, DVM  
Companion Animal Program Coordinator

96P-0418

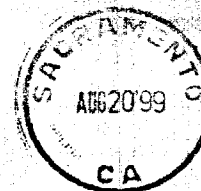
C 371



ANIMAL  
PROTECTION  
INSTITUTE

P.O. Box 22505  
Sacramento, CA 95822

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852



U.S. POSTAGE

00.33:

H METER 546389

20837-0001



CROSS FILE SHEET

File Number:

98N-1230/ **C 371**

See File Number:

97P-0197/ **C 372**

96P-0418/ **C 371**